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I. INTRODUCTION

As the sponsoring agency responsible to operate a new countywide 800 MHz trunked interoperable radio system serving county and local public safety agencies, the County of St. Louis, Missouri, (“The County”) appointed to represent all public safety agencies within St. Louis County (that includes 92 municipalities, 67 law enforcement agencies, 45 fire departments and districts with 9,000 radios operating within the geographic borders of St. Louis County) which will migrate to the new county-wide emergency communication system (listed in Appendix A) hereby respectfully requests that the Federal Communications Commission (“Commission” or “FCC”) grant a waiver of 47 C.F.R. § 90.209(b), specifically the requirement to convert 163 FCC radio authorizations (listed in Appendix B) operating within the County of St. Louis, MO to a bandwidth of 11.25 kHz or less by the date of January 1, 2013.¹ The new county-wide radio system will be operated and managed by the St. Louis County Emergency Communications Commission formed by Missouri State Statute and St. Louis County Ordinance (listed in Appendixes C and D respectively). The Emergency Communications Commission is appointed by the St. Louis County Council with representation from County and Municipal Police Departments, Municipal Fire Departments and Fire Districts, and county and municipal leadership. We believe that the current narrowbanding deadline of December 31, 2012 poses a significant threat to the St. Louis Urban Area² (“Urban Area”) and the County plan to complete implementation of an essential interoperable communication county-wide system for all first responders in the St. Louis Urban Area. The Urban Area encompasses over 250 public safety

¹ See *Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, Third Memorandum Opinion and Order, Third Further Notice of Proposed Rule Making and Order, WT Docket No. 99-87, 19 FCC Rcd 25045, 25051-52 ¶¶ 12-13 (2004) (requiring most PLMR licensees in the 150-174 MHz and 421-512 MHz bands to migrate to 12.5 kHz technology by January 1, 2013) (Narrowbanding Memorandum Opinion and Order); see also 47 C.F.R. § 90.209(b)(5).*

² *The Urban Area is defined as the Missouri counties of Franklin, Jefferson, St. Charles, St. Louis, the independent City of St. Louis, and the Illinois counties of Madison, Monroe and St. Clair.*

agencies with over 23,000 public safety radio users.

II. BACKGROUND

In 2003 the federal government began the Urban Areas Security Initiative (UASI) program to help urban areas deemed at risk to enhance their security in the face of terrorism and natural disasters. With funding from the UASI program, the St. Louis Area Regional Response System (STARRS) developed a Regional Emergency Communications Plan for improving interoperability in the St. Louis Urban Area. The Urban Area, the three counties in Illinois and the four counties in Missouri, not including the City of St. Louis, have within their borders different forms of local government; which range from local municipalities with their own services (police, fire, public works, etc.) to single purpose political subdivisions that include fire protection, ambulance, school and sewer districts.

The County is a sponsoring agency in cooperation with the East-West Gateway Council of Governments to implement an eight county (and the independent City of St. Louis, MO) interoperable St. Louis Regional Land Mobile Emergency Communications Plan that was funded by Homeland Security Grants and was unanimously adopted by the region in June, 2008. The adopted plan was based on Homeland Security guidelines, that each of the eight counties in the Urban Area would fund, implement and operate independent county-wide systems networked together to create a system of systems.

This is part of the Urban Area Security Initiative to combat the threats to the safety of the public that may be caused by natural or man-made situations. Currently, the public safety agencies within the Urban Area are in the process of upgrading, procuring and implementing mission-critical communication systems on the current NPSPAC, Mid-Band, and 700 MHz narrowband radio frequency spectrum as allocated in the FCC NPSPAC & NCC Regions 13

and 24 Planning Committees' 700 and 800MHz frequency plans. The Region 24 NPSPAC plan³ includes significant channel-frequency allocations to the County for the future expansion of its portion of the Emergency Communications Plan. The FCC has accepted the extended implementation plans (see Appendix E) for the current 800 MHz licenses⁴ and the Regional Planning Committees will be presented with the same extended implementation schedule for licensing of NPSPAC channels. Beginning November 2007, the St. Louis Urban Area started the development of the plan for this new system of systems implementation. The independent City of St. Louis is in the final stages of upgrading and expanding its 800 MHz trunked system and expects to complete the migration-to the system in early 2011. During 2009 and 2010, St. Clair County, Illinois expanded the use of its 800MHz trunked radio system to add fire departments that serve St. Clair and its neighboring counties. In addition, the Illinois counties of Madison and Monroe are expanding their use of the state 800MHz system and are transitioning public safety agencies to that state system. In 2009, Jefferson County 911 Dispatch, St. Charles County and St. Louis County in Missouri passed sales tax initiatives to fund the build-out of independent county-wide systems to support all of the public safety agencies that operate within the respective counties. The acquisition process for these systems has started and these three new systems will support over 14,000 of the estimated 23,000 public safety radio users of the Urban Area's combined public safety agencies. This expansion of the Urban Area's Land

³ *Approved by the Federal Communications Commission September 2009*

⁴ *The Commission has approved an Extended Implementation Schedules for the St. Louis County trunked radio system until December 31, 2013 under radio authorization call signs WQLN802, WQLP208 subject to filing yearly progress reports. Radio authorization call sign WQJY940 has a pending amendment for extended implementation. Call Signs WQLN802, WQLP208 and WQJY940 are authorized to the Saint Louis County Radio Commission, FRN No. 0001825416*

Mobile Emergency Communications Plan represents over \$150 Million in funds that have been committed to provide emergency radio communications to over 50% of the Urban Area's public safety radio users. Franklin County, Missouri is in the final stage of developing its funding plan once implemented; this will complete the regions' transition to 800MHz interoperable radio communications platforms. Jefferson County 911 Dispatch, St. Charles County and St. Louis County are currently scheduled to be evaluating bid proposals during the 3rd and 4th quarter of 2010 and fully expect their new systems to be completed on time and on budget by December 31st 2013.

III. REQUEST FOR NARROWBANDING WAIVER.

Under Section 1.3 of the Commission's rules,⁵ the Commission may exercise its discretion to waive a rule for "good cause shown."⁶ A waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation will help serve the public interest.⁷

The waiver process allows the Commission to "maintain the fundamentals of principled regulation without sacrifice of administrative flexibility and feasibility."⁸ In deciding whether or not to grant specific waiver requests, the Commission has indicated it must "take into account considerations of hardship, equity, or more effective implementation of overall policy" in its

⁵ 47 C.F.R. § 1.3.

⁶ *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief*, Order, 14 FCC Rcd 6806, ¶ 11 (1999).

⁷ *Id.* (citing *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) and *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969)).

⁸ *WAIT Radio*, 418 F.2d at 1159.

broader quest for regulation in the “public interest.”⁹ As explained below, granting of the County’s request on behalf of the public safety licensees would serve policy objectives of the Commission, particularly the deployment of spectrum to meet public safety needs.

Narrowbanding the 222 channel-frequencies authorized by 163 radio authorizations, held by 73 unique FRN number licensees in the County, would divert extensive financial, and human resources to work on radio units and stations that will be dismantled within twelve months of the completion of the new county-wide system. Because of the St. Louis Regional Land Mobile Emergency Communications Plan Regional Plan’s breadth, complexity, and large number of participants, the County and the Urban Area cannot fully deploy this 800 MHz interoperable system by the January 1, 2013 deadline for narrowbanding. Requiring the County, the St. Louis Urban Area, and its partner public safety agencies to narrowband, then subsequently have the newly narrow-banded systems decommissioned within a few months appears counter to the public interest. Given the critical need for interoperable communications in the County and the Urban Area, the ability to fully utilize the Urban Area’s Land Mobile Emergency Communications Plan will improve interoperability, promote RF spectrum efficiencies, and reduce threats to the safety and lives of the County and Regions’ first responders and the health and property of the public they serve. Allowing the County and its member public safety licensees to continue operating on the VHF and UHF frequencies in the wideband mode will further the Commission’s goal of helping public safety provide the most effective and efficient communications for the American public.

⁹ *Id.*

IV. CONCLUSION

The County of St Louis, the St Louis Urban Area, and its member public safety agencies respectfully request that the Commission grant a waiver of the requirement to attain an efficiency standard of 12.5 kHz through the narrowbanding for the existing 163 VHF and UHF radio authorizations identified in Appendix B. The duration of this waiver is to the end date of the Extended Implementation Schedule, December 31, 2013. That will permit an orderly transfer of the traffic load from those VHF and UHF stations to the new 800 MHz radio facilities. As the traffic is transferred, the radio authorizations for the underlying VHF and UHF channel-frequencies vacated will be cancelled through the appropriate FCC filings. Implementation project management of the new 800 MHz system will include tracking the prompt cancellation of vacated VHF and UHF channel-frequencies. The new interoperable 800 MHz radio system will have the capability of efficiently accommodating future expansion on the NPSPAC, Mid-Band, and 700 MHz channels.

The County and St. Louis Urban Area are aware of the high hurdle applied to a waiver of the Commission's rules and the requirement to clearly articulate the detailed considerations in Section 1.925 of the Commission's rules.¹⁰ We believe that this request complies with the submission details of the waiver process in that:

1. The underlying purpose of the narrowband rule would not be frustrated by waiver of this case. The waiver request does not extend the date for reduction of bandwidth to a lengthy or indefinite date, but asks to extend the requirement for a finite period of time to permit the establishment of a new interoperable region wide network. The basis for narrowband is to make additional spectrum available in the VHF and UHF band. This

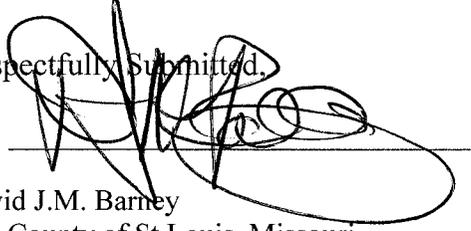
¹⁰ 47 C.F.R. § 1.925.

goal will be accomplished when the county public safety agencies move to the new system and completely cancel all UHF and VHF licenses that are no longer required.

2. The grant of the waiver will be in the public interest. The cost of narrowbanding is an expense that competes with the need for an improved, interoperable communications network at a time when the economy shortage of tax dollars limits the expansion of funding sources.
3. Unique and unusual factual circumstances indicate the application of the rule would be unduly burdensome to the County and contrary to the Public Good. The County and UA had hoped that the new multi-agency interoperable system would be in operation prior to the January 1, 2013 narrowband transition date. As with many large, complex systems involving multi-jurisdictional agencies, the timing was delayed. To this is added the economic downturn, which has constrained state, county, and local governments from committing to large projects. The County has established the St. Louis County Emergency Communications Commission that includes the governance framework for the new county system. Dedicated funding has now been obtained by the County for the implementation and operation of the new system. A new multi-agency, multi-county, interoperable system is a unique endeavor unto itself and will provide an example of what can be accomplished through cooperative efforts between county and local public safety agencies, and the Commission. We have moved in this direction with the encouragement and at the behest of the Department of Homeland Security who has recognized its value through direct and indirect grants.

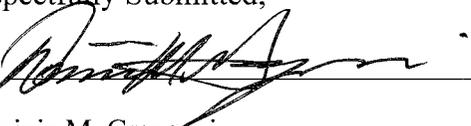
Grant of the waiver as described above for each of the 163 VHF and UHF radio authorizations (listed in Appendix B) would therefore be in the public interest.

Respectfully Submitted,

By: 

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Respectfully Submitted,

By: 

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V. **APPENDIX A – PUBLIC SAFETY AGENCIES IN ST. LOUIS COUNTY**

Public Safety Agencies in St. Louis County, Missouri	
Law Enforcement	Fire\EMS
Ballwin Police Department	Affton Fire Protection District
Bella Villa Police Department	Berkley Fire Department
Bellefontaine Neighbors Police Department	Black Jack Fire Protection District
Bel-Nor Police Department	Brentwood FPD
Bel-Ridge Police Department	Central County 911
Berkeley Police Department	Clayton Fire Department
Beverly Hills Police Department	Community Fire Department
Breckenridge Hills Police Department	Crestwood Fire Department
Brentwood Police Department	Creve Coeur Fire Protection District
Bridgeton Police Department	Des Pere Public Safety - See PD List
Calverton Park Police Department	East Central Fire Alarm
Charlack Police Department	Eureka Fire Protection District
Chesterfield Police Department	Fenton Fire Protection District
Clayton Police Department	Ferguson Fire Department
Cool Valley Police Department	Florissant Fire Department
Country Club Hills Police Department	Frontenac Fire Department
Crestwood Police Department	Glendale Fire Department
Creve Coeur Police Department	Hazelwood Fire Department
Dellwood Police Department	Jennings Fire Department
Des Peres Department of Public Safety	Kinloch Fire Protection District
Edmundson Police Department	Kirkwood Fire Department
Ellisville Police Department	Ladue Fire Department
Eureka Police Department	Lemay Fire Protection District
Ferguson Police Department	Maplewood Fire Protection District
Florissant Police Department	Maryland Heights Fire Protection District
Frontenac Police Department	Mehlville
Glendale Police Department	Meramac Ambulance District
Hazelwood Police Department	Metro North Fire Protection District
Hillsdale Police Department	Metro West Fire Protection District
Jennings Police Department	Mid County Fire Protection District
City of Kinloch	Monarch Fire Protection District
Kirkwood Police Department	North Central County Fire Alarm
Ladue Police Department	Northeast Ambulance & Fire Protection District
Lakeshire Police Department	Olivette Fire
Manchester Police Department	Pacific FPD
Maplewood Police Department	Pattonville Fire Protection District

Maryland Heights Police Department
Moline Acres Police Department
Normandy Police Department
Northwoods Police Department
Olivette Police Department
Overland Police Department
Page Dale Police Department
Pine Lawn Police Department
Richmond Heights Police Department
Riverview Police Department
Rock Hill Police Department
Shrewsbury Police Department
St. Ann Police Department
St. John Police Department
St. Louis County Police Department
St. Louis County Justice Services
St. Louis County Sheriff's Office
Sunset Hills Police Department
Town & Country Police Department
University City Police Department
Village of Uplands Park
Velda City Police Department
Vinita Park Police Department
Warson Woods Police Department
Webster Groves Police Department
Wellston Police Department
Woodson Terrace Police Department
Florissant Valley Community College Police
Meramac Community College Police
South County Education and University Center
University of Missouri - St. Louis Police
Washington University Police Department
Wildwood Community College Police

Richmond Heights Fire Protection District
Riverview Fire Protection District
Robertson Fire Protection District
Rock Hill Fire Department
Shrewsbury Fire Protection District
South County Fire Alarm
Spanish Lake Fire Protection District
University City Fire Department
Valley Park
Webster Groves Fire Department
West County EMS & Fire Protection District
West Overland Fire Protection District

VI. APPENDIX B – 163 RADIO AUTHORIZATIONS

Callsign	License FRN	Licensee Name	Licensee City
WPCH899	0007315914	ARCH AIR MEDICAL SERVICE	SAINT LOUIS
KLI986	0004752366	BALLWIN, CITY OF	BALLWIN
WNBY943	0004752366	BALLWIN, CITY OF	BALLWIN
KYS891	0002510600	BEL RIDGE, VILLAGE OF	BEL RIDGE
KDD997	0008115362	BERKELEY, CITY OF	BERKELEY
KNGA967	0008115362	BERKELEY, CITY OF	BERKELEY
WQLX919	0008115362	BERKLEY, CITY OF - PUBLIC WORKS DEPT.	BERKLEY
WPPZ324	0012999736	BEVERLY HILLS, CITY OF	ST LOUIS
WPUU990	0005019336	BI-STATE DEVELOPMENT AGENCY	ST LOUIS
KNIH353	0002540524	BLACKJACK, CITY OF	FLORISSANT
KAD965	0002514446	BRENTWOOD, CITY OF	BRENTWOOD
KAX585	0002514446	BRENTWOOD, CITY OF	BRENTWOOD
KB90639	0002514446	BRENTWOOD, CITY OF	BRENTWOOD
KIZ203	0002514446	BRENTWOOD, CITY OF	BRENTWOOD
KGW715	0002510113	BRIDGETON, CITY OF	BRIDGETON
KQP620	0002510113	BRIDGETON, CITY OF	BRIDGETON
KVR948	0002510113	BRIDGETON, CITY OF	BRIDGETON
WNPM675	0002510113	BRIDGETON, CITY OF	BRIDGETON
KAF919	0003903481	CENTRAL COUNTY EMERGENCY 911	ELLISVILLE
KNAA594	0003903481	CENTRAL COUNTY EMERGENCY 911	ELLISVILLE
WNJZ901	0003903481	CENTRAL COUNTY EMERGENCY 911	ELLISVILLE
WPDN529	0003903481	CENTRAL COUNTY EMERGENCY 911	ELLISVILLE
WPTF687	0003903481	CENTRAL COUNTY EMERGENCY 911	ELLISVILLE
WPYL622	0003903481	CENTRAL COUNTY EMERGENCY 911	ELLISVILLE
WQBP945	0003903481	CENTRAL COUNTY EMERGENCY 911	ELLISVILLE
WQKQ484	0003903481	CENTRAL COUNTY EMERGENCY 911	ELLISVILLE
KB65536	0002510568	CHARLACK, CITY OF	CHARLOCK
KDN462	0002514065	CLAYTON, CITY OF	CLAYTON
KNCV288	0002514065	CLAYTON, CITY OF	CLAYTON
KNHS875	0002510352	COOL VALLEY, CITY OF	COOL VALLEY
KNHW504	0002510352	COOL VALLEY, CITY OF	BEVERLY HILLS
KNIK936	0002510352	COOL VALLEY, CITY OF	COOL VALLEY
KNIZ671	0004189544	CRESTWOOD, CITY OF	CRESTWOOD
KFN575	0002510642	CREVE COEUR, CITY OF	CREVE COEUR
KNDY231	0002510642	CREVE COEUR, CITY OF	CREVE COEUR
WNXR498	0002510642	CREVE COEUR, CITY OF	CREVE COEUR
KOL768	0002510253	DES PERES, CITY OF	DES PERES
WQA732	0012982161	DES PERES, CITY OF	DES PERES

WQFS223	0014280911	EAST WEST GATEWAY COUNCIL OF GOVERNMENTS	TOWN AND COUNTRY
WYG503	0008799389	EDMUNDSON, CITY OF	EDMUNDSON
KUG660	0012579488	ELLISVILLE, CITY OF PUBLIC WORKS	ELLISVILLE
KWT733	0013479761	EUREKA, CITY OF	EUREKA
WNMJ345	0002547412	FENTON, CITY OF	FENTON
KAG843	0002513711	FERGUSON, CITY OF	FERGUSON
KDZ410	0002513711	FERGUSON, CITY OF	SAINT LOUIS
KJA399	0002513711	FERGUSON, CITY OF	FERGUSON
KKL533	0002513711	FERGUSON, CITY OF	FERGUSON
KTS741	0002513711	FERGUSON, CITY OF	FERGUSON
KAK437	0005654074	FLORISSANT, CITY OF	FLORISSANT
KCE423	0005654074	FLORISSANT, CITY OF	FLORISSANT
KDP315	0002513679	FLORISSANT, CITY OF	FLORISSANT
WNJG307	0005654074	FLORISSANT, CITY OF	FLORISSANT
WZU919	0005654074	FLORISSANT, CITY OF	FLORISSANT
KDJ559	0002511004	FRONTENAC, CITY OF	FRONTENAC
WNAR657	0002511004	FRONTENAC, CITY OF	FRONTENAC
WNHY209	0002511004	FRONTENAC, CITY OF	FRONTENAC
KAF654	0007801475	GLENDALE, CITY OF	GLENDALE
KFD596	0007801475	GLENDALE, CITY OF	GLENDALE
KTO531	0005653738	HAZELWOOD, CITY OF	HAZELWOOD
WPVW325	0005653738	HAZELWOOD, CITY OF	HAZELWOOD
WPXV740	0005653738	HAZELWOOD, CITY OF	HAZELWOOD
KAG586	0004752903	JENNINGS, CITY OF	JENNINGS
KNFA348	0002511897	JENNINGS, CITY OF	ST LOUIS
KNNF498	0004752911	JENNINGS, CITY OF	JENNINGS
KAB267	0002513182	KIRKWOOD, CITY OF	KIRKWOOD
KBA754	0002513182	KIRKWOOD, CITY OF	KIRKWOOD
KJD219	0002513182	KIRKWOOD, CITY OF	KIRKWOOD
KAA516	0002513133	LADUE, CITY OF	LADUE
KDP333	0002513133	LADUE, CITY OF	SAINT LOUIS
KNBT896	0005654017	LADUE, CITY OF	SAINT LOUIS
WYZ359	0002513133	LADUE, CITY OF	LADUE
WQBU605	0002537512	LAKE SAINT LOUIS, CITY OF	LAKE ST LOUIS
KQL714	0004311353	LAMBERT ST. LOUIS INTERNATIONAL AIRPORT AUTHORITY	ST. LOUIS
KDW983	0002509990	MANCHESTER, CITY OF	MANCHESTER
WPNU640	0002509990	MANCHESTER, CITY OF	MANCHESTER
KAF575	0002512861	MAPLEWOOD, CITY OF	MAPLEWOOD
KDP976	0002512861	MAPLEWOOD, CITY OF	MAPLEWOOD
WQL501	0002512861	MAPLEWOOD, CITY OF	MAPLEWOOD
WNDC578	0007007271	MARYLAND HEIGHTS, CITY OF	MARYLAND

			HEIGHTS
WNVH212	0005661350	MEHLVILLE FIRE PROTECTION DISTRICT	SAINT LOUIS
WNXB746	0005661350	MEHLVILLE FIRE PROTECTION DISTRICT	SAINT LOUIS
KNBC996	0002510501	METROPOLITAN SAINT LOUIS SEWER DISTRICT	SAINT LOUIS
KNGU704	0002510501	METROPOLITAN ST LOUIS SEWER DISTRICT	ST LOUIS
KCW721	0003903481	MONARCH FIRE PROTECTION DISTRICT	CHESTERFIELD
KM9118	0003903481	MONARCH FIRE PROTECTION DISTRICT	CHESTERFIELD
WQJB922	0016598641	MRS RADIO	PAGEDALE
WPIG779	0013957600	NORMANDY, CITY OF	NORMANDY
KBG256	0002542421	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM	SAINT JOHN
KXO621	0002542421	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM	SAINT JOHNS
KAE752	0002542421	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM, INC.	ST. LOUIS
KB60907	0010641561	OLIVETTE, CITY OF	OLIVETTE
KBJ204	0007725625	OLIVETTE, CITY OF	OLIVETTE
KCU299	0007725625	OLIVETTE, CITY OF	OLIVETTE
KYD815	0002512531	OLIVETTE, CITY OF	OLIVETTE
KAD427	0002512515	OVERLAND, CITY OF	OVERLAND
KLR430	0002512515	OVERLAND, CITY OF	OVERLAND
KVV914	0005653746	PAGEDALE, CITY OF	SAINT LOUIS
WQC622	0005653746	PAGEDALE, CITY OF	SAINT LOUIS
KAD543	0005658117	RICHMOND HEIGHTS, CITY OF	RICHMOND HEIGHTS
KNAX731	0005658117	RICHMOND HEIGHTS, CITY OF	RICHMOND HEIGHTS
KNBV304	0005658117	RICHMOND HEIGHTS, CITY OF	ST LOUIS
WNVD911	0013556568	ROCK HILL, CITY OF	ROCK HILL
WVW266	0004752655	ROCK HILL, CITY OF	ROCK HILL
WPTQ524	0005653894	ROCK HILL, CITY OF	ROCK HILL
KDP310	0009834458	SAINT ANN, CITY OF	SAINT ANN
KTE559	0002512127	SAINT ANN, CITY OF	SAINT ANN
WPMQ517	0009599200	SAINT JOHN, CITY OF	SAINT JOHN
KAG632	0002511939	SAINT LOUIS CITY OF	SAINT LOUIS
KX9559	0002537868	SAINT LOUIS ZOO	SAINT LOUIS
KDZ387	0002511939	SAINT LOUIS, CITY OF	SAINT LOUIS
KUU495	0004311353	SAINT LOUIS, CITY OF	SAINT LOUIS
WAN949	0002511939	SAINT LOUIS, CITY OF	SAINT LOUIS
WFK499	0002511939	SAINT LOUIS, CITY OF	SAINT LOUIS
WFN221	0002511939	SAINT LOUIS, CITY OF	SAINT LOUIS
WFS749	0004311353	SAINT LOUIS, CITY OF	SAINT LOUIS
WGT318	0004311353	SAINT LOUIS, CITY OF	SAINT LOUIS
WPPE283	0009693573	SAINT LOUIS, CITY OF	SAINT LOUIS
WSQ963	0002511939	SAINT LOUIS, CITY OF	SAINT LOUIS

WXR301	0002511939	SAINT LOUIS, CITY OF	SAINT LOUIS
KAA519	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KB21164	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KBH779	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KBV825	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KD5414	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KEW985	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KJE232	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KNBU687	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KNDR655	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KZC638	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
WNFX701	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
WPDQ259	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
WPFJ479	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
WRA409	0002511897	SAINT LOUIS, COUNTY OF	CLAYTON
KA21119	0004752515	SHREWSBURY, CITY OF	SHREWSBURY
KAG297	0002511731	SHREWSBURY, CITY OF	SAINT LOUIS
WPLV535	0002511731	SHREWSBURY, CITY OF	SHREWSBURY
WXB922	0002511731	SHREWSBURY, CITY OF	SHREWSBURY
WPKY463	0002530111	SOUTH COUNTY FIRE ALARM ASSN INC	SAINT LOUIS
KAK618	0002530111	SOUTH COUNTY FIRE ALARM ASSOCIATION INC	ST LOUIS
KZB287	0002530111	SOUTH COUNTY FIRE ALARM ASSOCIATION INC	SAINT LOUIS
KLW330	0002547255	ST LOUIS COMMUNITY COLLEGE AT FLORISSANT VALLEY	ST LOUIS
KRT720	0002547255	ST LOUIS COMMUNITY COLLEGE AT MERAMEC	KIRKWOOD
KA96529	0002511897	ST LOUIS, COUNTY OF	CLAYTON
KAL741	0002511897	ST LOUIS, COUNTY OF	CLAYTON
KNFH767	0002511897	ST LOUIS, COUNTY OF	CLAYTON
KNFU316	0002511897	ST LOUIS, COUNTY OF	CLAYTON
KXX628	0002511897	ST LOUIS, COUNTY OF	CLAYTON
WNZF597	0002511897	ST LOUIS, COUNTY OF	CLAYTON
WPNX681	0002511897	ST LOUIS, COUNTY OF	CLAYTON
KJG922	0013656392	SUNSET HILLS, CITY OF	SUNSET HILLS
KVT878	0002510394	SUNSET HILLS, CITY OF	SAINT LOUIS
KMK909	0002514560	TOWER GROVE PARK DISTRICT	SAINT LOUIS
KDG344	0005653696	TOWN AND COUNTRY, CITY OF	TOWN AND COUNTRY
KAA875	0005653803	UNIVERSITY CITY, CITY OF	UNIVERSITY CITY
KDK629	0002511533	UNIVERSITY CITY, CITY OF	UNIVERSITY CITY
KJR350	0002511533	UNIVERSITY CITY, CITY OF	UNIVERSITY CITY
WPRH361	0002511897	VALLEY PARK, CITY OF	VALLEY PARK
WYR605	0002510311	WARSON WOODS, CITY OF	WARSON

			WOODS
KLU447	0007007065	WASHINGTON UNIVERSITY	SAINT LOUIS
KAB954	0002511392	WEBSTER GROVES, CITY OF	WEBSTER GROVES
KCK557	0002511392	WEBSTER GROVES, CITY OF	WEBSTER GROVES
KOM549	0002511392	WEBSTER GROVES, CITY OF	WEBSTER GROVES
KLY812	0002510444	WOODSON TERRACE, CITY OF	WOODSON TERRACE

**VII. APPENDIX C -MISSOURI STATE STATUE FOR COUNTY
EMERGENCY COMMUNICATIONS COMMISSION**

Section 650-393 Commission established, membership, ter

Page 1 of 1

Missouri Revised Statutes

**Chapter 650
Department of Public Safety
Section 650.393**

August 28, 2009

Commission established, membership, terms.

650.393. 1. The governing body of a county may establish an emergency communications system commission within the geographical boundaries of such county. Each such commission shall be composed of seven commissioners appointed by the chief executive officer of the county in which the commission is established.

2. The commission shall include a chief of police of a municipality located within the county, the chief of the police or the sheriff of the county, a chief of a municipal fire department located within the county, a chief of a fire protection district located within the county, and three at-large commissioners, who shall be residents of the county, all subject to the confirmation of the governing body of the county. Where applicable, the member who is a municipal chief of police shall be chosen from those persons nominated by a local police chiefs association. The members who are chiefs of either a municipal fire department or a fire protection district shall be chosen from those persons nominated by a local fire chiefs association. One at-large commissioner shall be chosen from those persons nominated by a local municipal league or organization. At least two of the at-large commissioners shall be persons who are not employed by a fire department or district, a police or sheriff's department, or any emergency medical system, or who are not elected or appointed officials of a political subdivision of the state or are not employed by the state of Missouri.

3. The terms of office of the commissioner who is a chief of police or sheriff of the county shall be coterminous with such person's term of office as chief of police or sheriff. At the first meeting of the commission, the other commissioners shall choose the length of their terms, with two commissioners serving for two years, three commissioners serving for three years and one commissioner serving for four years. All succeeding commissioners shall serve for five years. Terms shall end on December thirty-first of the respective year. No commissioner shall serve for more than two consecutive full terms. A commissioner who is not an at-large commissioner shall remain in office only so long as he or she retains office with the department or district that such commissioner served at the time such person was appointed to the board of commissioners. Vacancies on the board of commissioners shall be filled by persons appointed by the chief executive officer of the county in the same manner by which the commissioner whose office is vacant was first appointed.

(L. 2002 S.B. 795)

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Missouri General Assembly

VIII. APPENDIX D – ST. LOUIS COUNTY ORDINANCE THAT FORM ECC

BILL NO. 3, 2003

ORDINANCE NO. 21,238, 2003

Introduced by Council members Mange, O’Mara and Campisi

AN ORDINANCE

AMENDING TITLE VII SLCRO 1974 AS AMENDED, “PUBLIC SAFETY AND MORALS,” BY ENACTING AND ADDING THERETO A NEW CHAPTER TO BE KNOWN AS CHAPTER 725, “ST. LOUIS COUNTY EMERGENCY COMMUNICATIONS SYSTEM COMMISSION.”

BE IT ORDAINED BY THE COUNTY COUNCIL OF ST. LOUIS COUNTY, MISSOURI, AS FOLLOWS:

SECTION 1. Title VII SLCRO 1974 as amended, “Public Safety and Morals,” is amended by enacting and adding thereto one new chapter, which chapter shall be known as Chapter 725, “St. Louis County Emergency Communications System Commission,” which shall read as follows:

CHAPTER 725

ST. LOUIS COUNTY EMERGENCY COMMUNICATIONS SYSTEM COMMISSION

725.010 Commission established. – 1. The St. Louis County Emergency Communications System Commission is established within the geographical boundaries of St. Louis County.

2. The Commission shall be composed of seven commissioners who are residents of the County and appointed by the County Executive, subject to confirmation by the County Council. The Commission shall include a chief of police of a municipality located within the County, the Superintendent of the St. Louis County Police Department, a chief of a municipal fire department located within the County, a chief of a fire protection district located within the County, and three at-large commissioners. The commissioner who is a municipal police chief shall be chosen from those persons nominated by a police chief’s association in the County. The commissioners who are chiefs of either a municipal fire department or fire protection district shall be chosen by those persons nominated by a fire chiefs association located in the County. One at-large commissioner shall be chosen from among those persons nominated by a municipal league or organization located in the County. At least two of the at-large commissioners shall be persons who are not employed by a fire department or district, or by a police department, or by an emergency medical system, or who are not elected or appointed officials of a political subdivision of the state or are not employed by the state of Missouri.

3. The terms of office of the commissioner who is the Superintendent of the St. Louis County Police Department shall be coterminous with such person’s term of office as Superintendent. At the first meeting of the Commission, the other commissioners shall choose the length of their

terms, with two commissioners serving for two years, three commissioners serving for three years and one commissioner serving for four years. All succeeding commissioners shall serve for five years. Terms shall end on December thirty-first of the respective year. No commissioner shall serve for more than two consecutive full terms. A commissioner who is not an at-large commissioner shall remain in office only so long as he or she retains office with the department or district that such commissioner served at the time such person was appointed to the commission. Vacancies on the commission shall be filled by such persons appointed by the County Executive in the same manner by which the commissioner whose office is vacant was first appointed.

725.020 Funding for support of the system; levy of tax, issuance of bonds. – 1. By a majority vote of the qualified voters voting thereon, the County may levy and collect a tax on the taxable real property in the County, not to exceed six cents per one hundred dollars of assessed valuation or a sales tax not to exceed one-tenth of one percent, for the purpose of providing necessary funds to establish, operate and maintain the emergency communications system established by this Chapter; or to supplement existing funds for the system. Any such vote shall be placed before the electorate by ordinance and shall be substantially in the form set out in Section 650.399 R.S.Mo. (2000).

2. The County may issue bonds for and on behalf of the County payable out of the sales tax or real property tax authorized by this section, for the purpose of supporting the operations and other purposes of the emergency communications system. Whenever the commission proposes to issue bonds pursuant to this section, the County shall submit the question to the voters according to the procedure and in substantially the form described in Section 650.408 R.S.Mo. (2000).

3. The County shall not sell such bonds for less than ninety-five percent of the par value thereof, and the proceeds shall be paid over to the county treasurer, and disbursed on warrants drawn by the president or vice president of the board of commissioners and attested by the secretary. The proceeds of the sale of such bonds shall be used for the purpose only of paying the cost of holding such election, and constructing, repairing and maintaining the emergency communication system and its appurtenances.

4. Such bonds shall be payable and collectible only out of moneys derived from tax revenues authorized by this Chapter, from the sale of such bonds or from interest that may accrue on funds so derived while on deposit with any County depository. The Accounting Officer shall hold in reserve, for payment of interest on such bonds, a sufficient amount of the money so derived that may come into his or her hands in excess of the amount then necessary to pay all bonds and interest then past due, to pay all interest that will become payable before the next installment of such special tax becomes payable, and three percent of the principal amount of the bonds not then due. The Accounting Officer shall, whenever any of the bonds or interest thereon become due, apply such money as may be in his or her custody and applicable thereto, or that may thereafter come into his or her custody and be applicable thereto, to payment of such bonds and interest as may be due and unpaid.

5. All money derived from the taxes authorized pursuant to this Chapter shall be used in paying the bonds and the interest thereon, except that the money that may be collected pursuant to such taxes in excess of the amount necessary to pay all bonds then past due and such bonds and interest as will become payable before another assessment of such tax becomes payable may, less an amount equal to three percent of the principal amount of the bonds not then due, be used for the purposes authorized in this Chapter.

6. The Accounting Officer shall, as such bonds are sold, deliver them to the purchaser upon being ordered to do so by the commissioners. The Accounting Officer shall cancel bonds as such bonds are paid, and shall deliver them to the Administrative Director.

7. All money derived from the sale of bonds pursuant to this Chapter except such portion as is required to be reserved pursuant to subsections 4 and 5 of this section, all money collected on any tax authorized according to this section and all interest that may accrue on moneys so derived while deposited with any county depository and not required to be used in paying such bonds or interest thereon, shall be used, and warrants drawn on the county treasurer therefor, to pay:

(1) The cost and expenses incurred by the emergency communications system commissioners in maintaining any real or personal property used in the operation of the emergency communication system for which the system was organized; and

(2) Such working, administrative and incidental expenses, not otherwise provided by law, as may be incurred in operating such emergency communications system.

725.030 Emergency Communications System Fund.- There is established the “Emergency Communications System Fund.” All funds collected from any tax authorized by this Chapter shall be deposited therein. The fund shall be administered by the commission to accomplish the purposes of the system set out in this Chapter, and for no other purpose.

725.040 Powers and responsibilities of the commission. – The commission shall have the following powers and responsibilities:

- (1) To supervise and administer, within the Purchasing Code, the building, acquisitions by purchase or otherwise, construction and operation of an emergency communications system for St. Louis County; and
- (2) To administratively control and manage the emergency communications system; and
- (3) To negotiate and recommend to the County Council that the County contract with such companies or other business entities which in the opinion of the commission are necessary to provide equipment, material and professional services to establish, construct and maintain an emergency communications system and conduct the business of the commission; and
- (4) To promulgate an annual report of the financial condition and operation of the commission and the emergency communications system; and
- (5) To recommend to the County Council that the County purchase or acquire by gift such real estate and equipment and materials necessary to accomplish the purposes of the commission and the system; and
- (6) To adopt such bylaws, rules and regulations as in the opinion of the commission shall best serve the purpose of the commission.

ADOPTED: JANUARY 21, 2003

GREGORY F. QUINN
CHAIRMAN, COUNTY COUNCIL

APPROVED: JANUARY 22, 2003

BUZZ WESTFALL
COUNTY EXECUTIVE

ATTEST: JEANETTE O. HOOK
DEPUTY ADMINISTRATIVE DIRECTOR

IX. APPENDIX E – EXISTING 800 MHZ LICENSES

Call Sign	Location	Channel	CP expiration	Notes
WQJY940	1	854.0625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.1875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.2625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.4875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
WQJY940	2	854.0625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.1875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.2625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.4875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
WQJY940	3	854.0625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.1875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.2625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.4875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
WQJY940	4	854.0625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.1875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.2625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.4875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
WQJY940	5	854.0625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.1875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.2625	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
"	"	854.4875	2/20/2010	Extension filed 2-10-2010. FCC File No. 0004122212.
WQLN802	1	856.6375	12/31/2013	Extended implementation granted in initial filing.
"	2	856.6375	12/31/2013	Extended implementation granted in initial filing.
WQLP208	1	854.5375	12/31/2013	Extended implementation granted in initial filing.
"	"	854.6125	12/31/2013	Extended implementation granted in initial filing.
"	"	854.6875	12/31/2013	Extended implementation granted in initial filing.
"	"	854.7375	12/31/2013	Extended implementation granted in initial filing.
"	"	856.1125	12/31/2013	Extended implementation granted in initial filing.

WQLP208	2	854.5375	12/31/2013	Extended implementation granted in initial filing.
"	"	854.6125	12/31/2013	Extended implementation granted in initial filing.
"	"	854.6875	12/31/2013	Extended implementation granted in initial filing.
"	"	854.7375	12/31/2013	Extended implementation granted in initial filing.
"	"	856.1125	12/31/2013	Extended implementation granted in initial filing.
WQLP208	3	854.5375	12/31/2013	Extended implementation granted in initial filing.
"	"	854.6125	12/31/2013	Extended implementation granted in initial filing.
"	"	854.6875	12/31/2013	Extended implementation granted in initial filing.
"	"	854.7375	12/31/2013	Extended implementation granted in initial filing.
"	"	856.1125	12/31/2013	Extended implementation granted in initial filing.

APPENDIX F
Request for Extended Implementation Schedule
Expedited Consideration Requested
Saint Louis County, MO

The County of Saint Louis, as part of the St. Louis Regional Communications Core Group a consortium of governmental agencies in the Greater St. Louis Region, consisting of the Counties of Franklin MO, St. Charles MO, Madison IL, Monroe IL, Jefferson County, MO, St. Clair IL, St. Louis MO, and the City of St. Louis MO and Jefferson County 911 Dispatch, MO, requests consideration of SLOW GROWTH IMPLEMENTATION as defined in 47CFR 90.629.

In June 2008, the above-referenced governmental agencies elected to move forward with an interoperability strategy with the adoption of the St. Louis Emergency Land Mobile Emergency Communications Plan. The Emergency Communications Plan is based on the following:

1. Networking independent digital county systems (i.e. system of systems) to support interoperable communications for first responders. This consists of interconnecting various county Project 25 trunked digital radio\microwave systems using the new regional microwave system collocated at the county trunked radio sites to improve system reliability and provide regional connectivity.
2. Creating a highly fault tolerant infrastructure thereby supporting all emergency public safety communications within the region.
3. Designing a system with the capacity and functionality to support additional non-emergency municipal users including local, county, regional, state and federal users.
4. Implementing an open standard (Project 25 and IP) based system of systems that is compatible with regional, as well as the State of Illinois and State of Missouri interoperability initiatives, including Region 13 and 24 Regional Planning Committees.
5. Coordinating with critical infrastructure service providers in the region to improve interoperability and share infrastructure where practical.

Objectives

The St. Louis Regional Communications Core Group decided to design a seamless regional interoperability emergency communications network that would efficiently utilize existing spectrum and the sharing communications assets. The required policies and procedures for all members of the St. Louis Regional Communications Core Group to support regional communications are currently under development. Three of the five

Missouri localities within the St. Louis UASI without P25 systems, including Saint Louis County, have secured funding for the development of specifications, procurement and implementation for new microwave and P25 radio systems. The remaining county is currently engaged in development of a funding strategy.

Governance

The St. Louis Regional Communications Core Group is a sub-committee to the Executive Board of the East West Gateway Council of Governments (EWG), which serves the greater St. Louis area. Members of the Core Group are appointed by members of the EWG Executive Board. Through the auspices of the EWG an Inter-local Agreement setting forth the governance and policies and procedures for regional interoperability is near completion and will serve as the governing document for the region's public safety communications. The Core Group coordinates with the respective county policy groups to improve interoperable communications across the region.

The County Policy Groups consists of representatives from fire, emergency communications, emergency management, emergency medical, police and public works representatives. The Core Group working with the County Policy Groups form working groups to develop communications protocols which once approved the Core Group and County Policy Groups become operating procedures for the region. There is also a technical sub-committee to the Operations Group consisting of technical personnel from the member localities that advise the Core Group on technical matters related to the systems and protocols.

The County has formed The St. Louis County Emergency Communications Commission. St. Louis County Emergency Communications Commission is the Policy Group for all public safety agencies within St. Louis County. The new county-wide radio system will be operated and managed by the St. Louis County Emergency Communications Commission formed by Missouri State Statute and St. Louis County Ordinance. The Emergency Communications Commission is appointed by the St. Louis County Council with representation from County and Municipal Police Departments, Municipal Fire Departments and Fire Districts, and county and municipal leadership. The St. Louis County Emergency Communications Commission will coordinate county\regional activity with the Core Group.

The individual county policy groups are responsible for coordinating with all emergency response agencies that operate within their respective counties, securing the required funding to implement and operate the county-wide emergency communications systems. County Policy groups have formed county based Operation Groups. The Operations Group is responsible for the development of communications protocols which once approved by the County Policy Group to become operating procedure for the county. There is also a technical sub-committee to the Operations Group consisting

of technical personnel from the member localities that advise the Operations and County Policy Group on technical matters related to the systems and protocols.

In summary the Core Group works closely with the Saint Louis County Emergency Communications Commission to ensure that any opportunity to improve the effectiveness and efficiency of emergency communications is coordinated with local, county, state and federal emergency response agencies.

Background

The Saint Louis County, and local entities contained, have current radio systems based on vintage conventional communications system architecture. These older systems are also using a significant number of VHF frequency channels that were allocated when the systems were initially installed meanwhile the number of radio users and system requirements have increased expediently throughout the County.

These congested outdated systems frequently experience routine severe radio congestion and that forces agencies to limit access to these capacity stressed systems. This then limits interoperability with public service and public safety organizations in the region due to the limited capacity of the existing channels.

In addition, the county will start a parallel evaluation process by which they will identify the VHF and UHF frequencies that will be decommissioned and returned to the pool following the cutover to the new county-wide system. The evaluation process will also identify the limited number of frequencies that will be retained for mutual aid and operational requirements.

Current Status

Saint Louis County has secured funding for implementing a county-wide system to support all agencies that operate within the County, with capacity to support regional interoperable communications to the systems for all St Louis Regional Communication participants. On April 7, 2009, Saint Louis County passed a dedicated sales tax to fund the development of this new interoperable communications system. A radio consultant was retained to work with Saint Louis County to develop system specifications that were included in the request for proposal from radio equipment vendors that was released on June 20, 2010.

Proposed Extended Implementation Schedule

2010	
1 st Quarter	Radio Specifications RFP released
3 rd Quarter	Radio System RFP response due
4 th Quarter	Review & Evaluation Initiated
2011	
1 st Quarter	Bid Evaluation Completed and Contract Awarded
2 nd Quarter	Saint Louis County Contract Awarded
3 rd Quarter	Site Development Begins
4 th Quarter	System Factory Staging and Acceptance
2012	
1 nd Quarter	Fixed Base Installation Begins
3 rd Quarter	Installation Completed – Subscriber testing begins
4 th Quarter	Initiate final system acceptance testing
2013	
1 st Quarter	Install subscriber units into countywide public safety fleet
2 nd Quarter	General Acceptance Testing and system cutover
3 rd Quarter	System burn-in
4 th Quarter	Abandon Legacy frequencies

Summary

The rules, 47CFR 90.625, provides that specific conditions must be met to attain extended implementation status. The time table schedule details the planned approach to the construction of the system. Specifically, in Paragraph (a)(1), due to the purpose, size, and complex nature of the proposed system, which is comprised of eight major governmental entities and numerous smaller public safety entities, as well as covering two states, a one-year period of time to implement channels isn't feasible. Extremely large systems routinely take the full five-years allowed under Section 90.629 of the Commission's rules and in fact there have been instances that those systems have taken even longer than the Commission's rules permit. Further, in Paragraph (a)(2), the Saint Louis County system is part of a coordinated and integrated wide area system, which will require more than 12 months to purchase, construct and place into operation. The County has passed the funding hurdle and is moving toward the purchase of the new 800 MHz system.

The St. Louis Regional Communications Core Group has been moving forward on all fronts, from working with Regional Planning Committees for additional spectrum, to

passing county tax funding initiatives, to working in the development a state of the art interoperability system to serve all jurisdictions.

Therefore, with good cause shown, it is in the public interest, convenience and necessity to grant the subject request for extended implementation. Such extended implementation authority is in the public interest and will foster the development of total interoperability in the St Louis Urban Area Security Initiative plan.

The county and Public Safety entities with the respective entities will return the VHF frequencies no longer required to support mutual aid and specific operational requirements.